

Exhibit A

(Almanzar Declaration)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
KEBE STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

DECLARATION OF BELCALIS MARLENIS ALMÁNZAR

I, Belcalis Marlenis Almánzar, make the following declaration:

1. I am the plaintiff in the above-entitled action. I have personal knowledge of the facts set forth herein.
2. I am twenty-eight years old. My date of birth is October 11, 1992.
3. I am a Grammy award-winning musical artist, songwriter, and television personality professionally known as “Cardi B.”
4. Since the release of my debut mixtape in 2015, my music has reached peak positions on charts in the United States and around the world.

5. As a result of the popularity of my music, I have millions of fans in the United States and around the world.

6. In my personal life, I am a proud and loving mother of a young girl, and I have been recognized for my philanthropic endeavors.

7. On or around September 19, 2018, Defendant Latasha Transrina Kebe (“Kebe”) published a video interview on YouTube with an individual named Starmarie Jones (“Jones”) entitled “Exclusive: Cardi B’s Ex-FRIEND ALLEGES Cardi B. Kept A Huge Box filled with MONISTAT & REVEALS More!” (the “9/19/18 Video”).

8. Jones claimed in this video interview that I was a prostitute, that I used cocaine, and that I have herpes. Each of these statements is false.

9. In order to make her stories about me seem believable, Jones also claimed we were roommates. However, Jones never lived with me.

10. Kebe has published numerous malicious and vile videos and social media posts containing false and defamatory statements that I have herpes, that I have HPV, that I used cocaine, that I appeared in a video placing a beer bottle in my vagina, that I committed infidelity, and that I was a prostitute (the “Defamatory Statements”). Each of these statements is false.

11. I do not have herpes. On August 12, 2020, I was tested for herpes at UCLA and the results were negative.

12. I also do not have HPV. On September 23, 2020, I was tested for HPV at UCLA and the results were negative.

13. I have never used cocaine.

14. I am not the person depicted in the video placing a beer bottle in her vagina and I have never engaged in such an act.

15. The video Kebe described has been shared on the pornography website Pornhub. I have publicly stated on multiple occasions, including on Twitter, that I am not the person depicted in this video. Because Kebe evidently follows my social media accounts, I believe she was aware that I had made these statements before she falsely claimed that I appeared in this video.

16. I have never committed infidelity.

17. I have never been a prostitute.


18. The Defamatory Statements published by Kebe and her intentional, vicious, and relentless cyber-bulling campaign to defame and harass me have caused me intense stress, tremendous shame, embarrassment, humiliation, mental anguish, and severe emotional distress. I have been seeing a clinical psychologist, Dr. Sherry Blake, since 2018 as a result of the Defamatory Statements. I continue

to receive individual psychotherapy and have been diagnosed with depression and anxiety due to the overwhelming emotional distress inflicted on me by Kebe.

19. The Defamatory Statements have further caused significant damage to my name, character, and my reputation.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 29, 2020



Belcalis Marlenis Almánzar